

FILED

JUN 23 2021

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM DONOVAN
JOHNSON III,
a/k/a "Billy Johnson,"
DAVID SCOTT CHAMBERS,
a/k/a "Scott Chambers,"
GENE OLEN CHARLES RAST,
SHAUNI BREANNE CALLAGY,
RENEE LYNN HAYNES,

Defendants.

Case No. 21-CR-102-CVE

SUPERSEDING INDICTMENT

[COUNT ONE: 21 U.S.C. §§ 846
and 841(b)(1)(A)(viii) – Drug
Conspiracy;

COUNTS TWO and THREE: 21
U.S.C. §§ 856(a)(1) and 856(b) –
Maintaining a Drug-Involved
Premises;

COUNTS FOUR and TEN: 18
U.S.C. § 1952(a)(3) – Interstate
Travel to Aid Racketeering;

COUNT FIVE: 21 U.S.C. §§
841(a)(1) and 841(b)(1)(B)(viii) –
Possession of Methamphetamine
with Intent to Distribute;

COUNT SIX: 18 U.S.C. §
924(c)(1)(A)(i) – Possession of
Firearm in Furtherance of a Drug
Trafficking Crime;

COUNT SEVEN: 21 U.S.C. §§
841(a)(1) and 841(b)(1)(A)(viii) –
Possession of Methamphetamine
with Intent to Distribute;

COUNT EIGHT: 21 U.S.C. §§ 846
and 841(b)(1)(A)(viii) – Drug
Conspiracy;

COUNT NINE: 21 U.S.C. §
841(a)(1) and 841(b)(1)(C) –
Possession of Methamphetamine
with Intent to Distribute;

Forfeiture Allegation: 21 U.S.C. §
853, 18 U.S.C. § 981(a)(1)(C), and
28 U.S.C. § 2461 – Drug and
Racketeering Forfeiture]

THE GRAND JURY CHARGES:

COUNT ONE

[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]

Beginning as early as in or about September 2020 and continuing until on or about October 10, 2020, in the Northern District of Oklahoma and elsewhere, the defendants, **WILLIAM DONOVAN JOHNSON III**, a/k/a “Billy Johnson,” **DAVID SCOTT CHAMBERS**, a/k/a “Scott Chambers,” and **SHAUNI BREANNE CALLAGY**, did knowingly, intentionally, and willfully conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to distribute and to possess with intent to distribute 500 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

COUNT TWO
[21 U.S.C. §§ 856(a)(1) and 856(b)]

Beginning as early as in or about September 2020 and continuing until on or about October 10, 2020, in the Northern District of Oklahoma, the defendants, **WILLIAM DONOVAN JOHNSON III**, a/k/a “Billy Johnson,” and **SHAUNI BREANNE CALLAGY**, did knowingly lease, rent, use, and maintain a place located at GPS Satellite Coordinates 36.638779, -94.681428, in Grove, Oklahoma, for the purpose of distributing and using methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

COUNT THREE
[21 U.S.C. §§ 856(a)(1) and 856(b)]

Beginning as early as in or about September 2020 and continuing until on or about October 10, 2020, in the Northern District of Oklahoma, the defendants, **WILLIAM DONOVAN JOHNSON III**, a/k/a “Billy Johnson,” and **SHAUNI BREANNE CALLAGY**, did knowingly lease, rent, use, and maintain a place located at 26371 South 650 Road, Grove, Oklahoma, for the purpose of distributing and using methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 856(a)(1) and 856(b).

COUNT FOUR
[18 U.S.C. § 1952(a)(3)]

On or about October 10, 2020, in the Northern District of Oklahoma and elsewhere, the defendant, **DAVID SCOTT CHAMBERS**, a/k/a “Scott Chambers,” travelled in interstate commerce from the State of Missouri to the State of Oklahoma with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, Possession of Methamphetamine With Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying of such unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

COUNT FIVE
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii)]

On or about October 12, 2020, in the Northern District of Oklahoma, the defendant, **GENE OLEN CHARLES RAST**, knowingly and intentionally possessed with the intent to distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT SIX
[18 U.S.C. § 924(c)(1)(A)(i)]

On or about October 12, 2020, in the Northern District of Oklahoma, the defendant, **GENE OLEN CHARLES RAST**, knowingly possessed the following firearm:

A Taurus .40 caliber semi-automatic pistol, serial number STE 17971, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is:

Possession of Methamphetamine with Intent to Distribute, a violation of Title 21, United States Code, Section 841(a)(1),

as set forth more fully in Count Five of this Indictment.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT SEVEN
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii)]

On or about May 31, 2019, in the Northern District of Oklahoma, the defendant, **WILLIAM DONOVAN JOHNSON III**, a/k/a “Billy Johnson,” knowingly and intentionally possessed with the intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT EIGHT
[21 U.S.C. §§ 846 and 841(b)(1)(A)(viii)]

Beginning on or about May 31 and continuing until on or about June 1, 2019, in the Northern District of Oklahoma and elsewhere, the defendants, **WILLIAM DONOVAN JOHNSON III**, a/k/a “Billy Johnson,” and **SHAUNI BREANNE CALLAGY**, did knowingly, intentionally, and willfully conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury to distribute and to possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance, its salts, isomers, and salts of its isomers, in violation of Title 21, United States Code Section 841(a)(1).

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A)(viii).

COUNT NINE
[21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C)]

On or about March 21, 2021, in the Northern District of Oklahoma, the defendant, **RENEE LYNN HAYNES**, knowingly and intentionally possessed with the intent to distribute methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TEN
[18 U.S.C. § 1952(a)(3)]

Beginning on or about March 18, 2021, and continuing to on or about March 21, 2021, in the Northern District of Oklahoma and elsewhere, the defendant, **RENEE LYNN HAYNES**, travelled in interstate commerce from the State of California to the State of Oklahoma with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, that is, Possession of Methamphetamine with Intent to Distribute, in violation of Title 21, United States Code, Section 841(a)(1), and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying of such unlawful activity.

All in violation of Title 18, United States Code, Section 1952(a)(3).

FORFEITURE ALLEGATION
[21 U.S.C. § 853, 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461]

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

Upon conviction of the offenses alleged in this Indictment, as a part of their sentences, the defendants, **WILLIAM DONOVAN JOHNSON III**, a/k/a “Billy Johnson,” **DAVID SCOTT CHAMBERS**, a/k/a “Scott Chambers,” **SHAUNI BREANNE CALLAGY**, and **RENEE LYNN HAYNES**, shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such drug and racketeering violations and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal drug law. The property to be forfeited includes, but is not limited to:

MONEY JUDGMENT

1. A money judgment in an amount of at least \$48,000, representing proceeds obtained by the Defendant **DAVID SCOTT CHAMBERS**, a/k/a “Scott Chambers,” as a result of the offenses;

CURRENCY

2. \$4,630.00 in United States currency, seized from the 2012 white Chevy Equinox on October 10, 2020;
3. \$1,113.00 in United States currency, seized from a 2012 white Chevy Equinox on October 10, 2020;

4. \$800 in United States currency, seized from the 2012 white Chevy Equinox on October 10, 2020;
5. \$59,790.00 in United States currency, seized from the 2012 white Chevy Equinox on October 10, 2020;
6. \$646.00 in United States currency, seized from William Donovan Johnson, III, a/k/a "Billy Johnson," on October 12, 2020;
7. \$38,806.00 in United States currency, seized from a trailer located in Cayuga Park Resort on October 12, 2020;
8. \$65,533 in United States currency, seized from a trailer located at South 650 Road on October 12, 2020;
9. \$16,475 in United States currency, seized from Room 2214 of the Downstream Casino Resort on June 1, 2019;

FIREARMS AND AMMUNITION

10. A Ruger .22 caliber revolver, serial number 20-96958;
11. A Jennings T380-CA .380 semi-automatic pistol, serial number 1466709;
12. A Taurus .40 caliber semi-automatic pistol, serial number STE 17971; and
13. Any and all ammunition.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in

value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 853, Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461.

CLINTON J. JOHNSON
Acting United States Attorney



THOMAS E. DUNCOMBE
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson
Grand Jury Foreperson